

EXHIBIT N

<p style="text-align: right;">Page 238</p> <p>1 Cab Company?</p> <p>2 A. West Palm Beach Taxi. No, it's not</p> <p>3 Yellow. Could be Yellow, but I don't know.</p> <p>4 Q. Would Mr. Epstein have the names or the</p> <p>5 list?</p> <p>6 A. Probably.</p> <p>7 MR. CRITTON: Form.</p> <p>8 BY MR. EDWARDS:</p> <p>9 Q. Anybody else?</p> <p>10 A. Sarah.</p> <p>11 Q. Sarah would have?</p> <p>12 A. Yes.</p> <p>13 Q. In addition to Mr. Epstein obviously</p> <p>14 knowing who's coming to and from the house, would</p> <p>15 Sarah also be familiar with the names of the girls</p> <p>16 and who they were?</p> <p>17 A. Yes.</p> <p>18 Q. In addition to Sarah and Mr. Epstein</p> <p>19 would Ghislaine Maxwell be familiar with the names</p> <p>20 of some of these girls?</p> <p>21 MR. CRITTON: Form.</p> <p>22 THE WITNESS: Yes.</p> <p>23 BY MR. EDWARDS:</p> <p>24 Q. Are these names kept in a database in a</p> <p>25 computer system?</p>	<p style="text-align: right;">Page 240</p> <p>1 A. Nadia was the number one girlfriend for</p> <p>2 Mr. Epstein. Very sweet girl, and she was always</p> <p>3 -- she would come over to the house but different</p> <p>4 girls with her all the time.</p> <p>5 Q. Okay. But Nadia, that's somebody who</p> <p>6 lives in New York?</p> <p>7 A. Nadia, I believe, yes, her address is in</p> <p>8 New York.</p> <p>9 Q. So how often would she stay at 358 El</p> <p>10 Brillo?</p> <p>11 A. Very often.</p> <p>12 Q. Usually every time when Mr. Epstein was</p> <p>13 there?</p> <p>14 A. Yes.</p> <p>15 Q. And she would for the most time fly on</p> <p>16 the plane with Mr. Epstein?</p> <p>17 A. Yes.</p> <p>18 Q. And it would be her and Mr. Epstein and</p> <p>19 oftentimes some other girls?</p> <p>20 A. Exactly.</p> <p>21 Q. Where some points I think earlier when</p> <p>22 Mr. Mermelstein was asking you questions where</p> <p>23 there was some confusion was we're talking about</p> <p>24 two different sets of girls, the girls that would</p> <p>25 come over and be labelled masseuses from the Palm</p>
<p style="text-align: right;">Page 239</p> <p>1 A. Could be.</p> <p>2 MR. CRITTON: I'm sorry, did you say</p> <p>3 could be?</p> <p>4 THE WITNESS: Yeah.</p> <p>5 MR. CRITTON: Move to strike as</p> <p>6 speculation.</p> <p>7 BY MR. EDWARDS:</p> <p>8 Q. When you say could be, why do you say</p> <p>9 that?</p> <p>10 A. Because there were too many and they were</p> <p>11 very organized and there is nothing you write on a</p> <p>12 piece of paper.</p> <p>13 Q. When you say they were very organized,</p> <p>14 are we talking --</p> <p>15 A. Mr. Epstein and Sarah.</p> <p>16 Q. Anybody else beside Mr. Epstein and</p>	<p style="text-align: right;">Page 241</p> <p>1 Beach area, and the girls that would fly on the</p> <p>2 plane with Mr. Epstein and Ms. Marcenacova.</p> <p>3 So, what I'm asking you is what, if any,</p> <p>4 involvement did Nadia Marcenacova have with the</p> <p>5 girls that would arrive and be labeled as</p> <p>6 masseuses behind closed doors with Mr. Epstein?</p> <p>7 MR. CRITTON: Form.</p> <p>8 THE WITNESS: He was the second -- the</p> <p>9 first role was Sarah and she was always --</p> <p>10 Nadia is a very shy person so she will be in</p> <p>11 the background.</p> <p>12 BY MR. EDWARDS:</p> <p>13 Q. Did you ever know of Nadia Marcenacova to</p> <p>14 engage in -- to be in the room with Mr. Epstein</p> <p>15 while any of these young girls were up there?</p> <p>16 MR. CRITTON: Form.</p> <p>17 THE WITNESS: Yeah.</p>
<p>17 Sarah, I guess beside Sarah that would do the</p> <p>18 scheduling to coordinate the times these girls</p> <p>19 would come to the house?</p> <p>20 A. I'm sorry, anybody else you say?</p> <p>21 Q. Right, aside from Sarah.</p> <p>22 A. No, no.</p> <p>23 Q. And do you know what role, if any, Nadia</p> <p>24 Marcenacova ever played in any of what would go on</p> <p>25 behind the bedroom door with Mr. Epstein?</p>	<p>18 BY MR. EPSTEIN:</p> <p>19 Q. How often do you remember Nadia and Mr.</p> <p>20 Epstein being in the room with any of these young</p> <p>21 girls?</p> <p>22 A. I would say most of the time.</p> <p>23 Q. Nadia would go up there too?</p> <p>24 A. Yeah.</p> <p>25 Q. Did you ever believe that Nadia was</p>

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<p style="text-align: right;">Page 250</p> <p>1 Q. Would you know the name if I said it?</p> <p>2 A. Yeah.</p> <p>3 Q. Bill Riley?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. Have you ever spoken with an</p> <p>6 investigator Paul Lavery?</p> <p>7 A. Could be, I'm not sure.</p> <p>8 Q. Okay. So Bill Riley came by your house</p> <p>9 personally?</p> <p>10 A. Yes.</p> <p>11 Q. And how long did you meet with him?</p> <p>12 A. Five minutes. He gave me his card, he</p> <p>13 gave me Mr. Critton telephone number, he said</p> <p>14 don't talk to Mr. Goldberger.</p> <p>15 Q. Did he tell you why you should call Mr.</p> <p>16 Critton?</p> <p>17 A. No. I assume that he was not on the case</p> <p>18 anymore, but I didn't ask questions but --</p> <p>19 Q. You assumed that who wasn't on the case</p> <p>20 anymore?</p> <p>21 A. Mr. Goldberger, Jack Goldberger.</p> <p>22 Q. Okay. But what I'm asking you, I guess,</p> <p>23 is did this investigator, Mr. Riley, tell you why</p> <p>24 it was important for you to call any attorney</p> <p>25 that's associated with Mr. Epstein, why was that</p>	<p style="text-align: right;">Page 252</p> <p>1 A. We discuss -- he asked me a lot of</p> <p>2 questions, obviously he didn't know a lot of</p> <p>3 things about the case, and I told him who I was,</p> <p>4 what I did in the house.</p> <p>5 Q. He told you he didn't know a lot about</p> <p>6 the case?</p> <p>7 A. No, no, no. He asked me questions about</p> <p>8 so I got the feeling that Mr. Critton didn't know</p> <p>9 as much as other lawyers.</p> <p>10 Q. Okay. Did you tell him what you told us</p> <p>11 here today?</p> <p>12 A. No. He asked me tell the truth, you</p> <p>13 know, just go over there, you know, he advise me</p> <p>14 like you're on your own, Alfredo, just tell the</p> <p>15 truth, you know. He didn't give me any advice.</p> <p>16 He paid for my gas. Thank you very much.</p> <p>17 And that's it, you know.</p> <p>18 The main thing I wanted to have a lawyer</p> <p>19 on my side but then I keep going to the first</p> <p>20 instance when my wife told me you don't need a</p> <p>21 lawyer, and I'm here today to say that, I'm here,</p> <p>22 I'm speaking the truth.</p> <p>23 Q. Okay. You mentioned there were five or</p> <p>24 six computers in the house?</p> <p>25 A. Yes.</p>
<p style="text-align: right;">Page 251</p> <p>1 important?</p> <p>2 A. He didn't say that. He didn't say that.</p> <p>3 He just said that get in touch and that's it.</p> <p>4 Because I said what am I going to do, because I</p> <p>5 said I thought this was -- you know, but I didn't</p> <p>6 know I was going to be subpoena. And like I said</p> <p>7 in the beginning of this deposition, I don't have</p> <p>8 an attorney so I don't have money, first of all,</p> <p>9 to pay for an attorney. First of all, I don't</p> <p>10 think I'm in trouble, but every time you hear high</p> <p>11 powered lawyers you feel intimidated so I said,</p> <p>12 listen, what am I going to do, and that was my</p> <p>13 basic question.</p> <p>14 Q. Okay. So then you spoke with somebody at</p> <p>15 Mr. Critton's office and arranged to meet with him</p> <p>16 personally?</p> <p>17 A. Yes. I called his secretary and we sit</p> <p>18 down with his assistant, the three of us.</p> <p>19 Q. So it was Mr. Critton, yourself, and</p> <p>20 somebody else?</p> <p>21 A. Yes.</p> <p>22 Q. And you sat down for another two hour</p> <p>23 period of time?</p> <p>24 A. Yes.</p> <p>25 Q. And what did you go over in that meeting?</p>	<p style="text-align: right;">Page 253</p> <p>1 Q. And do you know what happened to the</p> <p>2 computers?</p> <p>3 A. No.</p> <p>4 Q. You don't know where they are?</p> <p>5 A. (Shakes head.)</p> <p>6 Q. Nobody has told you?</p> <p>7 A. No.</p> <p>8 Q. You also mentioned there were photographs</p> <p>9 in the house?</p> <p>10 A. In the computers in the files.</p> <p>11 Q. Okay. But there were also still</p> <p>12 photographs around the house?</p> <p>13 A. Oh yes, yes.</p> <p>14 Q. Some of the girls have made the</p> <p>15 allegation that there were photographs of them</p> <p>16 nude in the house. Do you remember seeing that?</p> <p>17 A. In the closet, yeah, in a mosaic. It was</p> <p>18 one frame with probably 15 pictures, small</p> <p>19 pictures.</p> <p>20 MR. CRITTON: Repeat the question back.</p> <p>21 BY MR. EDWARDS:</p> <p>22 Q. Okay. Some of the girls that have</p> <p>23 lawsuits against Mr. Epstein with allegations</p> <p>24 similar to the allegations that C. and T. have</p> <p>25 made, which is that they were underage when Mr.</p>

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<p style="text-align: right;">Page 254</p> <p>1 Epstein was engaging in sex or sex acts with them, 2 also say that they have seen pictures of 3 themselves in frames in Mr. Epstein's house naked. 4 A. In his closet. 5 Q. Other than the picture -- and these are 6 girls who are making the allegation that they were 7 underage and there were pictures of them nude in 8 his house. 9 A. I didn't see pictures of C. there. 10 Q. I'm not talking about C. I'm saying 11 other girls that were underage or have made 12 allegations that they have seen pictures of 13 themselves in Mr. Epstein's house. 14 MR. CRITTON: Form. 15 BY MR. EDWARDS: 16 Q. Where would those photos have been, or 17 did you see them? 18 A. Yes, I see them inside his closet. 19 Q. It's one mosaic? 20 A. Yes, one mosaic. 21 Q. Other than there did you see any of these 22 pictures of young girls nude anywhere else in the 23 house? 24 MR. CRITTON: Form. 25 THE WITNESS: Nude with an art, yes, but</p>	<p style="text-align: right;">Page 256</p> <p>1 those photos? 2 A. One was a Columbian lady and one was -- 3 one from Spain, beautiful girls, that, you know, 4 but they were not -- not the ones the girls we're 5 talking about here. 6 Q. Okay. When you were hired were you hired 7 by Mr. Epstein or were you hired by one of his 8 companies? 9 A. Mrs. Maxwell. 10 Q. So it was -- was it a company owned by 11 Mrs. Maxwell? 12 A. Not directly. My paycheck was Jeffrey 13 Epstein. I mean, I was hired by Mr. Epstein 14 but -- 15 Q. Okay. I just understood you to say you 16 were hired by Mrs. Maxwell. 17 A. Exactly, she told me you're hired but 18 you're going to get paid by Mr. Epstein. 19 Q. And he wrote you personal checks? 20 A. No. The checks that came from New York, 21 Jeffrey Epstein Companies. 22 Q. It was out of his company? 23 A. Yes. 24 Q. Which company; do you know? 25 A. 456 Madison Avenue. It's next to the New</p>
<p style="text-align: right;">Page 255</p> <p>1 not pornography. You know, I saw them, they 2 were all over the place. For instance, in 3 the back only showing part of the rear, you 4 know. 5 BY MR. EDWARDS: 6 Q. But the photographs that I'm concerned 7 with -- 8 A. Not frontal pictures. 9 Q. The photographs I'm concerned with are 10 photographs of these West Palm Beach girls that 11 were labeled as masseuses that are being displayed 12 around the house anywhere in some state of 13 undress. 14 MR. CRITTON: Form. 15 THE WITNESS: No, I don't remember that. 16 BY MR. EDWARDS:</p>	<p style="text-align: right;">Page 257</p> <p>1 York Palace now. 2 Q. The name of the company is 456 Madison 3 Avenue? 4 A. No, no, it's -- I got it on the tip of my 5 tongue. Something like Caribbean or island 6 something investments, something like that. 7 If you call Lesley, her secretary, she 8 will tell you exactly. Because they answer the 9 phone like that, you know. 10 Q. What's Lesley's number? 11 A. Lesley, I don't have it. I can find out 12 for you. 13 Q. Do you think you could get Lesley's 14 number for us? 15 A. Yes. It's in Manhattan. 16 Q. Does she work for this company in 17 Manhattan?</p>
<p>17 Q. Okay. The only girls that -- the only 18 photograph that you remember of young girls nude 19 was in a mosaic that is in his closet? 20 A. Yes. 21 Q. Nothing that you remember that was on 22 display? 23 A. Downstairs, yes, but they were not these 24 girls, they were somebody else. 25 Q. Okay. Do you know who was -- who were in</p>	<p>17 MR. CRITTON: Form. 18 THE WITNESS: Manhattan, yes. 19 BY MR. EDWARDS: 20 Q. If the check was issued did Jeffrey 21 Epstein actually sign it himself? 22 A. No, it came through the comptroller. 23 Q. Who was the comptroller? 24 A. Bella was the assistant comptroller and</p>

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<p style="text-align: right;">Page 266</p> <p>1 BY MR. LANGINO: 2 Q. Are you currently in fear of Mr. Epstein? 3 A. Not at this particular moment but it's 4 something I have to be worry about, yes. 5 Q. Are you personally afraid of criminal 6 prosecution? 7 A. No. 8 Q. Do you believe that you did anything 9 illegal? 10 A. Illegal, no. 11 MR. LANGINO: I have no further 12 questions. Thank you. 13 MR. CRITTON: We're going to break in 14 about 15 minutes. Do you want to start and 15 go for 15 minutes or do you want to -- it's 16 up to you. 17 MS. EZELL: I'll start. 18 MR. WILLITS: When are we going to quit, 19 folks? 20 MR. CRITTON: In 15 minutes. 21 THE VIDEOGRAPHER: Might as well change 22 tapes. 23 MR. EDWARDS: Bob has to get back so 24 we've agreed we're going to come back some 25 other time.</p>	<p style="text-align: right;">Page 268</p> <p>1 THE STATE OF FLORIDA,) 2 COUNTY OF DADE.) 3 4 5 I, the undersigned authority, certify 6 that ALFREDO RODRIGUEZ personally appeared before 7 me on the 29th day of July, 2009 and was duly 8 sworn. 9 10 WITNESS my hand and official seal this 11 31st day of July, 2009. 12 13 14 15 16 MICHELLE PAYNE, Court Reporter 17 Notary Public - State of Florida 18 19 20 21 22 23 24 25</p>
<p style="text-align: right;">Page 267</p> <p>1 MR. WILLITS: Why don't we just stop now? 2 MS. EZELL: Okay. 3 MR. EDWARDS: Rather than you start. 4 MS. EZELL: Yeah, I won't get very far. 5 MR. EDWARDS: Sorry to do this with you, 6 we didn't finish. 7 MR. CRITTON: So we're stopped? 8 MR. EDWARDS: We're stopped. 9 THE VIDEOGRAPHER: Off the record. 10 (Thereupon, the videotaped deposition was 11 adjourned at 5:30 p.m.) 12 - - - 13 14 15 16</p>	<p style="text-align: right;">Page 269</p> <p>1 CERTIFICATE 2 3 The State Of Florida,) 4 County Of Dade.) 5 6 I, MICHELLE PAYNE, Court Reporter and 7 Notary Public in and for the State of Florida at 8 large, do hereby certify that I was authorized to 9 and did stenographically report the videotaped 10 deposition of ALFREDO RODRIGUEZ; that a review of 11 the transcript was requested; and that the 12 foregoing pages, numbered from 1 to 269, 13 inclusive, are a true and correct transcription of 14 my stenographic notes of said deposition. 15 I further certify that said videotaped 16 deposition was taken at the time and place 17 hereinabove set forth and that the taking of said 18 videotaped deposition was commenced and completed 19 as hereinabove set out. 20 I further certify that I am not an 21 attorney or counsel of any of the parties, nor am 22 I a relative or employee of any attorney or 23 counsel of party connected with the action, nor am 24 I financially interested in the action. 25</p>
<p>17 18 19 20 21 22 23 24 25</p>	<p>16 The foregoing certification of this 17 transcript does not apply to any reproduction of 18 the same by any means unless under the direct 19 control and/or direction of the certifying 20 reporter. 21 DATED this 31st day of July, 2009. 22 23 MICHELLE PAYNE, Court Reporter 24 25</p>

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NON PARTY (VR) 000314

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF FLORIDA

3 JANE DOE NO. 2, CASE NO: 08-CV-80119
4 Plaintiff,
5 Vs.

6 JEFFREY EPSTEIN,
7 Defendant.
8 _____/

9 JANE DOE NO. 3, CASE NO: 08-CV-80232
10 Plaintiff,
11 Vs.

CONDENSED

12 JEFFREY EPSTEIN,
13 Defendant.
14 _____/

15 JANE DOE NO. 4, CASE NO: 08-CV-80380
16 Plaintiff,
17 Vs.

18 JEFFREY EPSTEIN,
19 Defendant.
20 _____/

21 JANE DOE NO. 5, CASE NO: 08-CV-80381
22 Plaintiff,

23 Vs
24 JEFFREY EPSTEIN,
25 Defendant.
_____/

<p style="text-align: right;">Page 271</p> <p>1 JANE DOE NO. 6, CASE NO: 08-CV-80994 2 Plaintiff, 3 Vs. 4 JEFFREY EPSTEIN, 5 Defendant.</p> <hr/> <p>6 JANE DOE NO. 7, CASE NO: 08-CV-80993 7 Plaintiff, 8 Vs. 9 JEFFREY EPSTEIN, 10 Defendant.</p> <hr/> <p>11 C.M.A., CASE NO: 08-CV-80811 12 Plaintiff, 13 Vs. 14 JEFFREY EPSTEIN, 15 Defendant.</p> <hr/> <p>16 JANE DOE, CASE NO: 08-CV-80893 17 Plaintiff, 18 Vs. 19 JEFFREY EPSTEIN, 20 Defendant.</p> <hr/> <p>21 22 23 24 25</p>	<p style="text-align: right;">Page 273</p> <p>1 IN THE CIRCUIT COURT OF THE 15TH 2 JUDICIAL CIRCUIT IN AND FOR 3 PALM BEACH COUNTY, FLORIDA 4 CASE NO. 502008CA037319XXXXMB AB</p> <p>5 B.B., 6 Plaintiff, 7 Vs. 8 JEFFREY EPSTEIN. 9 Defendant.</p> <hr/> <p>10 11 12 1031 Ives Dairy Road 13 Suite 228 14 North Miami, Florida 15 August 7, 2009 16 1:15 p.m. to 5:30 p.m.</p> <p>17 CONTINUED 18 VIDEOTAPED 19 DEPOSITION 20 of 21 ALFREDO RODRIGUEZ</p> <p>22 taken on behalf of the Plaintiffs pursuant 23 to a Re-Notice of Taking Continued Videotaped 24 Deposition (Duces Tecum) 25</p>
<p style="text-align: right;">Page 272</p> <p>1 JANE DOE NO. II, CASE NO: 08-CV-80469 2 Plaintiff, 3 Vs. 4 JEFFREY EPSTEIN, 5 Defendant.</p> <hr/> <p>6 JANE DOE NO. 101 CASE NO: 08-CV-80591 7 Plaintiff, 8 Vs. 9 JEFFREY EPSTEIN, 10 Defendant.</p> <hr/> <p>11 JANE DOE NO. 102, CASE NO: 08-CV-80656 12 Plaintiff, 13 Vs. 14 JEFFREY EPSTEIN, 15 Defendant.</p> <hr/> <p>16 17 18 19 20 21 22 23 24 25</p>	<p style="text-align: right;">Page 274</p> <p>1 APPEARANCES: 2 3 MERMELSTEIN & HOROWITZ, P.A. 4 BY: ADAM HOROWITZ, ESQ. 5 18205 Biscayne Boulevard 6 Suite 2218 7 Miami, Florida 33160 8 Attorney for Jane Doe 2, 3, 4, 5, 9 6, and 7.</p> <p>10 ROTHSTEIN ROSENFELDT ADLER 11 BY: BRAD J. EDWARDS, ESQ., and 12 CARA HOLMES, ESQ. 13 Las Olas City Centre 14 Suite 1650 15 401 East Las Olas Boulevard 16 Fort Lauderdale, Florida 33301 17 Attorney for Jane Doe and E.W. 18 And L.M.</p> <p>19 PODHURST ORSECK 20 BY: KATHERINE W. EZELL, ESQ. 21 25 West Flagler Street 22 Suite 800 23 Miami, Florida 33130 24 Attorney for Jane Doe 101 and 102.</p> <p>25 LEOPOLD-KUVIN 26 BY: ADAM J. LANGINO, ESQ. 27 2925 PGA Boulevard 28 Suite 260 29 Palm Beach Gardens, Florida 33410 30 Attorney for B.B.</p>

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<p style="text-align: right;">Page 299</p> <p>1 A. I don't remember, Ma'am. He came from 2 New Albany, Ohio. 3 Q. From New -- 4 A. New Albany, Ohio. 5 Q. New Albany, Ohio. Did he have his own 6 business? 7 A. No, he worked for Mr. Epstein. He will 8 maintain all the computers. 9 Q. Was he there everyday? 10 A. No, ma'am. 11 Q. Do you know whether at that time Mr. 12 Epstein had an office in Palm Beach? 13 A. Not outside the house, no. 14 Q. Do you have any knowledge of whether or 15 not the video equipment was -- and I don't know 16 the technical term, forgive me, but was it the 17 kind of equipment that would record for a certain 18 amount of time and then record over that film? 19 A. I don't know. 20 MR. CRITTON: Form. 21 BY MS. EZELL: 22 Q. You don't know? 23 A. No, ma'am. 24 MR. CRITTON: Just for clarification, I 25 may have misunderstood, but I thought he</p>	<p style="text-align: right;">Page 301</p> <p>1 video, even phones. 2 Q. Would he also repair the televisions if 3 they needed work? 4 A. No. 5 Q. No. Did you have any kind of intercom 6 system in the house? 7 A. Yes, ma'am. 8 Q. And what kind of system was that? 9 A. It was standard office equipment, Lucid 10 Technologies maybe, but it was an intercom like we 11 using right now. 12 MS. EZELL: Just let the record reflect 13 that the witness pointed to the telephone on 14 the table that has a speaker phone. 15 THE WITNESS: Yes, ma'am. 16 BY MS. EZELL: 17 Q. And did you use that in your work? 18 A. Yes, ma'am. 19 Q. And what did you use it for? 20 A. Mr. Epstein used to page me when he 21 needed me. 22 Q. Did you have one of those phones in the 23 kitchen? 24 A. Yes, ma'am. 25 Q. And was there one out in the staff house</p>
<p style="text-align: right;">Page 300</p> <p>1 said he didn't even know the video equipment 2 existed until he read the FBI report. 3 MS. EZELL: He said he didn't know that 4 it was upstairs and downstairs, I believe. 5 MR. CRITTON: I thought he said he didn't 6 know that it even existed. 7 MS. EZELL: I may be wrong. 8 BY MS. EZELL: 9 Q. Did you know it existed before you read 10 the FBI report? 11 A. No, ma'am. 12 Q. I'm sorry, then I was wrong. 13 How did you know then that the young 14 technician from Ohio maintained the computers and 15 the video equipment? 16 A. Because we used to request -- there were</p>	<p style="text-align: right;">Page 302</p> <p>1 as well? 2 A. Yes, ma'am. 3 Q. Do you know where others were in the 4 house? 5 A. Probably have like 15 phones. We used to 6 have three in the staff house, one in the cabana, 7 two in the master bedroom, one in each room, 8 kitchen, dining room, Mrs. Maxwell's office, the 9 garage. 10 Q. Where was Mrs. Maxwell's office? 11 A. Under the stairs next to the kitchen. 12 Q. Can you give me some idea of what size 13 space that was? 14 A. It was probably -- we change the floor. 15 Twelve by five, something like that. 16 Q. And was the computer equipment in that</p>
<p>17 always problems with the computers so he came to 18 the house and he was the programmer. It was very 19 sophisticated. 20 MR. CRITTON: Form to the last question, 21 move to strike the answer as nonresponsive. 22 BY MS. EZELL: 23 Q. How did you know then that he maintained 24 the video equipment as well? 25 A. Because he was in charge of computers,</p>	<p>17 space? 18 A. Yes, ma'am. 19 Q. Do you know whether Ms. Maxwell kept the 20 names and telephone numbers of the girls who came 21 to do massages? 22 A. Yes, ma'am. 23 MR. CRITTON: Form. 24 BY MS. EZELL: 25 Q. Do you know that because you saw the</p>

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<p style="text-align: right;">Page 303</p> <p>1 names and phone numbers?</p> <p>2 MR. CRITTON: Form.</p> <p>3 THE WITNESS: Yes, ma'am.</p> <p>4 BY MS. EZELL:</p> <p>5 Q. Do you know if she kept pictures of the</p> <p>6 girls on the computer?</p> <p>7 A. Yes, she did.</p> <p>8 Q. And you know that as well because you</p> <p>9 happen to see them?</p> <p>10 A. Yes, ma'am.</p> <p>11 MR. CRITTON: Form to the last two</p> <p>12 questions.</p> <p>13 BY MS. EZELL:</p> <p>14 Q. Were they similar to the pictures that</p> <p>15 Ms. Kellen had on her computer?</p> <p>16 MR. CRITTON: Form.</p> <p>17 THE WITNESS: Yes, ma'am.</p> <p>18 BY MS. EZELL:</p> <p>19 Q. Did the pictures that they kept there</p> <p>20 look like pictures that were posed?</p> <p>21 A. They were more casual.</p> <p>22 Q. Did they look as though the person being</p> <p>23 photographed knew that they were being</p> <p>24 photographed?</p> <p>25 MR. CRITTON: Form.</p>	<p style="text-align: right;">Page 305</p> <p>1 computer?</p> <p>2 MR. CRITTON: Form.</p> <p>3 THE WITNESS: Yes, ma'am.</p> <p>4 BY MS. EZELL:</p> <p>5 Q. And did she generally have phone numbers</p> <p>6 for those girls?</p> <p>7 A. Yes, ma'am.</p> <p>8 Q. And were they generally pictures of the</p> <p>9 girls?</p> <p>10 MR. CRITTON: Form.</p> <p>11 THE WITNESS: No, ma'am.</p> <p>12 BY MS. EZELL:</p> <p>13 Q. And did Ms. Maxwell have a list of the</p> <p>14 girls who came to give massages?</p> <p>15 MR. CRITTON: Form.</p> <p>16 THE WITNESS: Yes, ma'am.</p> <p>17 BY MS. EZELL:</p> <p>18 Q. Did she have telephone numbers generally?</p> <p>19 A. Yes, ma'am.</p> <p>20 MR. CRITTON: Form.</p> <p>21 BY MS. EZELL:</p> <p>22 Q. Were there pictures on her computer of</p> <p>23 the girls who came to give massages?</p> <p>24 MR. CRITTON: Form.</p> <p>25 BY MS. EZELL:</p>
<p style="text-align: right;">Page 304</p> <p>1 THE WITNESS: No, ma'am.</p> <p>2 BY MS. EZELL:</p> <p>3 Q. And what can you tell me about that, what</p> <p>4 lead you to draw that conclusion?</p> <p>5 A. They were probably taken in parties in</p> <p>6 big reception or banquet.</p> <p>7 MR. CRITTON: Let me offer as a</p> <p>8 suggestion, not that you have to accept or</p> <p>9 that you would, you're using the term young</p> <p>10 girls generically, he has probably seen</p> <p>11 many, many young girls, there was no --</p> <p>12 you've used it interchangeably with just</p> <p>13 young girls versus young girls who may have</p> <p>14 come to -- purported to give a massage and,</p> <p>15 therefore, that may be a different answer,</p> <p>16 so that's part of my form objection.</p>	<p style="text-align: right;">Page 306</p> <p>1 Q. Ms. Maxwell I'm talking about.</p> <p>2 A. Yes, ma'am.</p> <p>3 Q. And were those pictures the more casual</p> <p>4 ones that you described when I asked whether or</p> <p>5 not the subject looked as though she knew she was</p> <p>6 being photographed?</p> <p>7 MR. CRITTON: Form.</p> <p>8 THE WITNESS: I'm sorry, can you repeat?</p> <p>9 BY MS. EZELL:</p> <p>10 Q. Yeah. The pictures of the young girls</p> <p>11 who came to the house to give massages that were</p> <p>12 on Ms. Maxwell's computer, did they appear to have</p> <p>13 been taken when the girls knew they were being</p> <p>14 photographed?</p> <p>15 MR. CRITTON: Form.</p> <p>16 THE WITNESS: I don't think they knew</p>
<p>17 MS. EZELL: Okay, thank you.</p> <p>18 BY MS. EZELL:</p> <p>19 Q. When I asked you about Ms. Kellen whether</p> <p>20 she had a list of the girls and telephone numbers,</p> <p>21 I think I asked about those girls that came to</p> <p>22 give massages, but let me go back and just ask it</p> <p>23 that way.</p> <p>24 Did you notice that Ms. Kellen had a list</p> <p>25 of the girls that came to give massages on her</p>	<p>17 they were being photographed.</p> <p>18 BY MS. EZELL:</p> <p>19 Q. I believe you said they were more casual</p> <p>20 pictures.</p> <p>21 A. Yes, ma'am.</p> <p>22 Q. Did you notice any nude photographs in</p> <p>23 those pictures?</p> <p>24 A. Yes, ma'am.</p> <p>25 MR. CRITTON: Form for the last question.</p>

10 (Pages 303 to 306)

<p>1 THE STATE OF FLORIDA,) 2 COUNTY OF DADE.) 3 4 5 I, the undersigned authority, certify 6 that ALFREDO RODRIGUEZ personally appeared before 7 me on the 7th day of August, 2009 and was duly 8 sworn. 9 10 WITNESS my hand and official seal this 11 18th day of August, 2009. 12 13 14 15 16 _____ 17 MICHELLE PAYNE, Court Reporter 18 Notary Public - State of Florida 19 20 21 22 23 24 25</p>	Page 471
<p>1 CERTIFICATE 2 3 The State Of Florida,) 4 County Of Dade.) 5 6 I, MICHELLE PAYNE, Court Reporter and 7 Notary Public in and for the State of Florida at 8 large, do hereby certify that I was authorized to 9 and did stenographically report the deposition of 10 ALFREDO RODRIGUEZ; that a review of the transcript 11 was not requested; and that the foregoing pages, 12 numbered from 270 to 472, inclusive, are a true 13 and correct transcription of my stenographic notes 14 of said deposition. 15 I further certify that said deposition was 16 taken at the time and place hereinabove set forth 17 and that the taking of said deposition was 18 commenced and completed as hereinabove set out. 19 20 I further certify that I am not an 21 attorney or counsel of any of the parties, nor am 22 I a relative or employee of any attorney or 23 counsel of party connected with the action, nor am 24 I financially interested in the action. 25</p>	Page 472
<p>16 The foregoing certification of this 17 transcript does not apply to any reproduction of 18 the same by any means unless under the direct 19 control and/or direction of the certifying 20 reporter. 21 22 DATED this 18th day of August, 2009. 23 24 _____ 25 MICHELLE PAYNE, Court Reporter</p>	

52 (Pages 471 to 472)

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